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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA
(Hon. Barry Ted Moskowitz)

UNITED STATES OF AMERICA Plaintiff, vs. PETER CARLO MERTENS, et al., Defendants.	CASE NO. 08CR0440-BTM **JOINT MOTION TO CONTINUE MOTION HEARING** **Date: June 20, 2008** **Time: 1:30 p.m.**

COMES NOW the plaintiff, United States of America, by and through its counsel, Karen P. Hewitt, United States Attorney, and Sherri W. Hobson, Assistant United States Attorney, and defendants William Hamman, through his counsel Frank J. Ragen; Peter Carlo Mertens, through his counsel, Patrick Q. Hall; Wayne Joseph Fernandes, through his counsel, Dorn G. Bishop; and Bettina Thakore, through her counsel, Lisa J. Damiani, and hereby jointly request the Court continue the Motion Hearing previously scheduled for June 20, 2008, at 1:30 p.m. to September 19, 2008, at 2:00 p.m.

This continuance is requested since defense counsel have not yet received all discovery in this case. Thousands of pages of discovery are to be produced along with video and Grand Jury testimony. Counsel need this time to adequately study discovery and write the motions.

Respectfully submitted,

Dated: June 9, 2008

s/Frank J. Ragen
FRANK J. RAGEN
Attorney for Defendant
WILLIAM HAMMAN

Dated: June 9, 2008

s/Patrick Q. Hall
PATRICK Q. HALL
Attorney for Defendant
PETER CARLO MERTENS

Dated: June 9, 2008

s/Dorn G. Bishop
DORN G. BISHOP
Attorney for Defendant
WAYNE JOSEPH FERNANDES

Dated: June 9, 2008

s/Lisa J. Damiani
LISA J. DAMIANI
Attorney for Defendant
BETTINA THAKORE

Dated: June 9, 2008

s/Sherri W. Hobson
SHERRI W. HOBSON
Assistant United States Attorney
Attorney for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA
(Hon. Barry Ted Moskowitz)

UNITED STATES OF AMERICA Plaintiff, vs. PETER CARLO MERTENS, et al., Defendants.	)	CASE NO. 08CR0440-BTM **CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED THAT:

I, LALANYA HAM, am a citizen of the United States and am at least eighteen years of age. My business address is 105 West F Street, Ste. 215, San Diego, California, 92101.

I am not a party to the above-entitled action. I hereby certify that I have caused to be served **JOINT MOTION TO CONTINUE MOTION HEARING** to the following ECF participants on this case:

Dorn G Bishop
dorn@dornbishoplaw.com,kstarrj@yahoo.com

Lisa J Damiani
ljdamiani@damianilawgroup.com,Comp1@damianilawgroup.com

Patrick Q Hall
hall@scmv.com,flores@scmv.com

Sherri Walker Hobson
Sherri.Hobson@usdoj.gov,melissa.d.johnson@usdoj.gov,efile.dkt.nes@usdoj.gov

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 9, 2008.

[signature]
LALANYA HAM